CDM

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April 3, 2006

Ms. Rachel N. Loftin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, California 94105-3901

Subject: Hewitt Landfill Property, North Hollywood Operable Unit, 7361 Laurel Canyon Blvd., Los Angeles, California, CalMat Co.

Dear Ms. Loftin:

On behalf of Vulcan Materials Company (dba CalMat Co.), CDM provides this response to your request for groundwater monitoring at the above site as described in your February 10, 2006 letter addressed to CalMat Co.

Three facility wells are associated with the site. A well location map, well construction information, and previous laboratory analytical results are provided in the attachment to this letter. One well, 4899, is located just west (upgradient) of the site, and wells 4909C and 4909F are located along the eastern site boundary (downgradient). Groundwater flows generally west to east.

The facility wells were last sampled in February 1989. Existing facility-well data indicate that detectable concentrations of nitrate, chloride, dissolved solids, PCE, and TCE exist both downgradient and upgradient, suggesting an upgradient source.

Since receiving your letter, Vulcan retained CDM to conduct a down-hole video survey on wells 4899 and 4909F on March 14, 2006, the purpose of which was to evaluate the wells' suitability for sampling after numerous inactive years. Well 4909C is owned by the Los Angeles Department of Water and Power (LADWP), and contained a non-removable packer that prevented us from conducting a down-hole video survey. Based on results of the down-hole video survey, CDM concluded that wells 4899 and 4909F will require redevelopment prior to sampling.

Site operations historically consisted of extraction and production of sand and aggregate materials until 1962. The site was thereafter utilized as a solid waste landfill until it was officially closed on November 12, 1975. Only non-hazardous solid waste and inert waste were accepted in the landfill. No liquid or hazardous wastes were accepted. The lowest elevation of landfill materials is approximately 700 feet amsl. Given groundwater elevations of between 480 and 490 feet amsl during the period of record, the landfill waste has not been in contact with groundwater.

In accordance with EPA's February 10, 2006 request, CDM will collect groundwater samples from the three facility wells. Wells will be purged until at least three casing volumes have been pumped, or water quality parameters (turbidity, pH, dissolved oxygen) have stabilized to within 10% of the previous measurement. Purging and sampling will be conducted using an electric submersible pump. CDM will utilize the dedicated pump in well 4909C, and a portable Grundfos pump (or equivalent) on wells 4899 and 4909F. Before sampling each wells, reusable equipment will be decontaminated using a steam cleaner or using an alconox solution. Purged and decontamination fluids will be contained onsite in 55-gallon drums pending transport and offsite disposal.

Each sample will be submitted to a State-certified environmental laboratory for the following analyses:

- PCE, TCE, 1,1-DCE, MTBE, 1,4-DCA, cis-1,2-DCE, and carbon tetrachloride by EPA Method 8260
- 1,2,3-TCP by EPA Method 504.1
- Title 22 Metals by EPA 6010/7471 (not filtered)
- Hexavalent Chromium by EPA Method 7196
- 1,4-dioxane by EPA Method 8270 SIM
- NDMA by EPA 1625
- Perchlorate by EPA Method 314.0
- Nitrate/Nitrite by EPA 353.3/354.1
- Anions and Cations by EPA Method 300.0/6010B
- Dissolved oxygen by EPA Method 360.1 (will be performed in the field)
- Sulfide by EPA Method 376.2 (EPA Method 9030, listed in your letter, is not applicable to aqueous samples)
- Dissolved (using 0.45 μm field filtration) iron and manganese

In addition to the primary groundwater samples described above, CDM will also collect quality assurance samples. These samples will consist of one equipment blank, one duplicate sample (from well 4899), and one trip blank. These samples will be submitted to the laboratory for the same analyses as the primary samples.

CDM will conduct well refurbishment by April 30, 2006, and will complete sampling, analyses and reporting by May 31, 2006. This schedule assumes reasonable availability of qualified subcontractors and a timely response from LADWP regarding our access to well 4909C.

If you have any questions regarding this response, please contact Brian Anderson of Vulcan.

Very truly yours,

John C. Bennett, P.G.
Project Manager
Camp Dresser & McKee Inc.

cc: Brian Anderson, P.G., Vulcan
Brian Ferris, Vulcan

Enclosure:
Attachment